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Attorney for Class Member and Objector
DAN L. WILLIAMS & CO.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:)	Case No.: 3:07-cv-05944-JST
)	
)	MDL No.: 1917
)	
CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION)	DECLARATION OF PAUL B. JUSTI IN SUPPORT OF MOTION FOR LEAVE TO FILE LATE AMENDED OBJECTIONS TO SPECIAL MASTER'S REPORT AND RECOMMENDATIONS
)	
This Document Relates To:)	
)	
All Indirect Purchaser Plaintiffs)	

I, Paul B. Justi, declare as follows:

1. I am counsel of record for class member and objector Dan L. Williams & Co. I make the following declaration based on personal knowledge and if called to testify as a witness, I could and would competently testify to the matters stated herein.

2. I only became aware today, March 4, 2016, that on February 23, 2016, the Court issued an Order directing that the objections to the Special Master's Report and Recommendations be re-filed with a page limit of only 15 pages within three days. I became

1 aware of it when I saw a reference by the Indirect Purchaser's Plaintiffs' counsel that they were
2 not responding to the previously-filed objections to the Special Master's Report and
3 Recommendations because I had not re-filed the objections in accordance with the Court's
4 February 23, 2016 Order.
5

6 3. Upon seeing this reference by the IPP, I went back and checked my email
7 in-box to locate the Order. Attached hereto as Exhibit 1 is a true and correct picture of my inbox
8 for ECF emails. The only two email notifications I received on February 23, 2016 were for
9 notifications for transcript orders. Attached hereto as Exhibits 2 and 3 are the first pages of the
10 email notifications reflected in my in-box as having been received on February 23, 2016. None
11 of the subsequent ECF filings of which I received notice are the Court's February 23, 2016 order
12 either. I did receive shortened versions of other objector's objections, but I was not aware that
13 these were being filed pursuant to the Court's February 23, 2016 Order.
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16 4. I have previously encountered a problem with ECF filing in this case.
17 Specifically, when I file pleadings electronically, I do not get email notification of my own
18 filings. My secretary contacted the Clerk's Office to try to address this problem, but to no avail.
19 At the time, the Clerk's Office said it was likely because of the number of recipients and it would
20 just take longer than usual. The problem did not resolve, but only seemed to be with respect to
21 my own filings. However, when I discovered that I had not received notice of the Court's
22 February 23, 2016 Order, I checked other email notifications and compared it to PACER and I
23 noticed that there are actually several recent filings regarding which I did not receive email
24 notification. Attached hereto as Exhibit 4 is a true and correct printout of the most recent filings
25 as shown on PACER, noting several filings that do not appear in my in-box. I have also checked
26 my spam and junk files and they do not appear there either, and also checked my deleted items to
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1 make sure that I had not inadvertently deleted anything. I am attempting to address this problem
2 going forward and my secretary contacted the ECF E-Filing Help Desk, who informed my
3 secretary that the Court's records show the email notifications I did not receive as having gone
4 out with no "bounce back" indicating that they did not go through. I am following up with my
5 internet service provider to see if they can shed any light of this situation.
6

7 5. I apologize to the Court for any inconvenience caused by my not having
8 received notice of the Court's February 23, 2016 Order. Even though the objections on behalf of
9 Dan L. Williams & Co. to the proposed settlement have previously been filed, I request that the
10 Court grant leave to re-file the amended objections specifically to the Special Master's Report
11 and Recommendations consistent with the page limit set forth in the Court's February 23, 2016
12 Order.
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14 I declare under penalty of perjury under the laws of the United States that the
15 foregoing is true and correct.
16

17 Executed on March 4, 2016 at Walnut Creek, CA.
18

19 _____
20 /s/Paul B. Justi
21 Paul B. Justi
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